

North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor Dee Freeman, Secretary

January 19, 2012

Sent Via Electronic Mail (Email) – bperry@omnisourcese.com

Mr. Bill Perry Regional Manager OmniSource Southeast LLC - Kernersville Plant P.O. Box 608 Kernersville, NC 27285-0608

Re:

Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011
Industrial Landfill Owned by OmniSource Southeast, LLC - Kernersville Plant, Atlantic Scrap and Processing, LLC, and United Metals Recyclers
Permit Numbers 34-20, 34-17, and 34-13
Forsyth County
DIN 15927

Dear Mr. Perry:

The Solid Waste Section has completed a review of the *Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011* (DIN 15886) and submitted via email on January 5, 2012 on behalf of Omnisource Southeast, LLC by W. Z. Baumgartner and Associates, Inc. The *Sampling and Analysis Plan for Groundwater Monitoring Revised December 2011* was submitted pursuant to the Notice of Violation (NOV) issued on September 2, 2011 for the violations of 15A NCAC 13B .0510(c) and 15A NCAC 2L .0106(d)(2) and pursuant to an email dated November 4, 2011 regarding a review of the *Sampling and Analysis Plan for Groundwater Monitoring* dated October 28, 2011 (DIN 15525).

The Sampling and Analysis Plan for Groundwater Monitoring Revised December 2011 includes the following modifications to the facility's groundwater monitoring well network:

- Groundwater monitoring wells MW-1R, MW-2, MW-3, MW-4, and MW-4D will be abandoned due to their well integrity;
- Three new downgradient groundwater monitoring wells (MW-12, MW-13, and MW-14) will be installed and subsequently surveyed by a NC licensed surveyor;
- One new upgradient groundwater monitoring well (MW-11) will be installed and subsequently surveyed by a NC licensed surveyor; and
- Two surface water sampling locations (SW-1 or SW-1A and SW-2) will be included during each semiannual water quality event for the facility.

In addition, the *Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011* included an implementation schedule:

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- 1. Within sixty (60) days of approval of the *Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011*, any existing groundwater monitoring wells at the facility will be abandoned and the new groundwater monitoring wells proposed will be installed;
- 2. Within sixty (60) days of approval of the Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011, two surface water sampling locations will be included and access to these locations will be improved;
- 3. Within thirty (30) days of the completion of the new groundwater monitoring wells, the first water quality monitoring event will be conducted;
- 4. Within sixty (60) days of the water quality monitoring event, a complete report will be submitted to NCDENR; and
- 5. Subsequent water quality monitoring of the monitoring network will then be conducted on a semiannual basis.

As a result, the Sampling and Analysis Plan Groundwater Monitoring Program Revised December 2011 is approved as described. If you have any questions or concerns regarding this letter, please contact me at 919-707-8294 or at jaclynne.drummond@ncdenr.gov. Thank you for your continued cooperation with this matter.

Sincerely,

Jaclynne Drummond

Compliance Hydrogeologist

Solid Waste Section

cc via email: James Winegar, Omnisource Southeast, LLC Environmental Manager

Mark Poindexter, Field Operations Supervisor Jason Watkins, Western District Supervisor CT Gerstell, Environmental Senior Specialist

John Murray, Permitting Engineer

Brian Wootton, Permitting Hydrogeologist

